

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT COURT**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**ORDER GRANTING THE NAS CHILDREN AD HOC COMMITTEE’S MOTION
REQUESTING ENTRY OF ORDER PURSUANT TO 11 U.S.C. §§ 105(A), 107(B) AND
FED. R. BANKR. P. 9018 AUTHORIZING THE FILING OF CERTAIN INFORMATION
AND EXHIBITS UNDER SEAL IN CONNECTION WITH THE NAS CHILDREN AD
HOC COMMITTEE’S *EX PARTE* MOTION REQUESTING A COURT ORDER
AUTHORIZING EXAMINATIONS PURSUANT TO FEDERAL RULES OF
BANKRUPTCY PROCEDURE 2004 AND 9006**

Pending before the Court is the *the NAS Children Ad Hoc Committee’s motion requesting entry of an Order, pursuant to 11 U.S.C. §§ 105(A), 107(B) and Fed. R. Bankr. P. 9018, authorizing the filing of certain information and exhibits under seal relating to the NAS Children Ad Hoc Committee’s ex parte motion requesting a court order authorizing examinations pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006.*” (the “**NAS Ad Hoc**”) (the “**Motion**”

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

to Seal”) for entry of an Order pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. 9018, authorizing the NAS Ad Hoc to file under seal the “Ex Parte *Motion of the NAS Children Ad Hoc Committee Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006*,”(the “**Motion**”) including but not limited to the exhibits attached hereto and supporting declarations, and to file a redacted version of these documents onto the public docket of these cases, and for related relief as described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and the consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and no other or further notice of the Motion being required; and after due deliberation, the Court having determined that the legal and factual bases set forth in the Motion establish good and sufficient cause for the relief granted herein, in that the proposed redacted information constitutes confidential information properly protected under the Third Amended Protective Order [ECF 1935] and protected under 11 U.S.C. § 107(b) on the terms of this Order; the determination that there would be no prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the documents or any part thereof to grant this motion, and such relief being in the best interest of all parties in interest, it is hereby **ORDERED** that:

1. The NAS Children Ad Hoc’s Motion is granted as set forth herein.
2. The NAS Ad Hoc is authorized and empowered to take all actions necessary to implement the relief granted in this order.

3. The NAS Ad Hoc is authorized to file its unredacted Motion and exhibits (the “**Sealed Documents**”), under seal, by providing the Sealed Documents, with a copy of this Order to the Clerk of the Court, Attn: Mimi Correa, in an envelope, wither paper or electronic, prominently marked TO BE FILED UNDER SEAL. The Sealed documents shall remain under seal, unless otherwise ordered by the Court or disclosed in accordance with the procedures outlined in the Protective Order [ECF 1935] or as agreed to by the NAS Ad Hoc, the Debtors, and other interested parties under appropriate confidentiality agreements between the parties.

4. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Bankruptcy Rule 9018-1, the NAS Ad Hoc is authorized to file to the public docket of these cases the redacted Motion and exhibits thereto, as set forth in the versions submitted to the Court in connection with the Motion (the “**Redacted Documents**”).

5. Entry of this Order is without prejudice to the rights of any party in interest in the Chapter 11 Cases or the U.S. Trustee to seek an order of this Court unsealing all or part of the redacted documents or sealed documents.

6. Counsel for the NAS Ad Hoc shall contact the Clerk’s Office regarding the return or other disposition of the sealed documents within 10 days after the determination by final order of the Motion. If the NAS Ad Hoc fails to do so, the Clerk of Court is authorized to destroy the sealed documents.

7. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: December ____, 2020
White Plains, NY

SO ORDERED,

The Honorable Robert D. Drain
United States Bankruptcy Judge